

TIMOTHY ELDER (CA BAR NO. 277152)
KRISTOPHER A. NELSON (CA BAR NO. 342552)
TRE LEGAL PRACTICE
1155 Market Street, Tenth Floor
San Francisco, CA 94103
Telephone: (415) 873-9199
Facsimile: (415) 952-9898
Email: telder@trelegal.com, knelson@trelegal.com

S. Tomiyo Stoner (CA Bar No. 289246)
Undaunted Law Firm, P.C.
600 California St., Floor 7
San Francisco, CA 94108
Telephone: (214) 415-7340
E-mail: tstoner@undauntedlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,

Plaintiff,

v.

**COUNTY OF ALAMEDA, MELISSA
WILK**, in her individual capacity, **EVA HE**,
in her individual capacity, **MARIA LAURA
BRIONES**, in her individual capacity,

Defendants.

Case No. 3:20-cv-06570-TSH

**DECLARATION OF TIMOTHY ELDER
IN SUPPORT OF PLAINTIFF'S
MOTION FOR PERMANENT
INJUNCTION**

1 I, Timothy Elder, declare:

2 1. I am an attorney admitted to practice in California and a counsel of record for Plaintiff
3 Lisamaria Martinez. This declaration is based on my personal knowledge. I am competent to
4 testify on the matters stated and declare that these items are true and accurate to the best of my
5 knowledge and belief.

6 2. Attached as **Exhibit A** is a true and correct copy of the 12-21-22 Expert Report of Karen
7 McCall.

8 3. Attached as **Exhibit B** is a true and correct copy of the 9/28/23 Expert Report of Karen
9 McCall.

10 4. Attached as **Exhibit C** is a true and correct copy of the 12/21/22 Expert Report of Steven
11 Clark.

12 5. Attached as **Exhibit D** is a true and correct copy of an email dated August 28, 2023 from
13 Jocelyn Cole with attached guidance to CRO staff, Bates stamped as County_0121-23. It was
14 proposed as Potential Trial Exhibit N (D14) in the pretrial Joint Exhibit List (ECF No. 105-5). It
15 was shown to Ms. Moran to refresh her memory at trial (Moran Tr. 240:10-241:10) but was not
16 introduced as an exhibit.

17 6. Attached as **Exhibit E** is a true and correct copy of relevant excerpts of Trial Transcript,
18 Volume 2, Testimony of Angelina Moran.

19 7. Attached as **Exhibit F** is a true and correct copy of relevant excerpts of Trial Transcript,
20 Volume 2, Testimony of Maria Laura Briones.

21 8. Attached as **Exhibit G** is a true and correct copy of relevant excerpts of Trial Transcript,
22 Volume 2, Testimony of Karen McCall.

23 9. Attached as **Exhibit H** is a true and correct copy of relevant excerpts of Trial Transcript,
24 Volume 3, Testimony of Matt Yankee.

25 10. Attached as **Exhibit I** is a true and correct copy of relevant excerpts of Trial Transcript,
26 Volume 3, Testimony of Steven Clark.

27 11. Attached as **Exhibit J** is a true and correct copy of relevant excerpts of Trial Transcript,
28 Volume 4, Testimony of Lisamaria Martinez.

1 12. Attached as **Exhibit K** is a true and correct copy of a June 30, 2023 email from Nicholas
2 Fine to Timothy Elder disclosing that the new online FBNS Web Access form or “FBNS suite”
3 had been implemented.

4 I declare under penalty of perjury that the foregoing is true and correct.
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7 Executed on: 5/16/24
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/s/ Timothy R. Elder
Timothy R. Elder
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